Comments of James F. Evans before the Federal Communications Commission in the matter of Broadcast Localism RM-10803

This is to urge the Commission to seek ways to help maintain and encourage more localized agricultural programming on radio and television stations throughout the nation.

While I write as an individual, my background as an agricultural communications faculty member at the University of Illinois for more than 30 years has given me an opportunity to examine agricultural broadcasting in society. My research interests have included the development and impacts of it, along with listenership, content, advertising support and programming methods.

It is beguilingly easy to focus first – and only – on agricultural broadcasting as serving farmers and ranchers, those who produce food and fiber. Furthermore, it is easy to think that declining numbers of producers and new kinds of electronic media mean less need for agricultural programming on broadcast stations that serve increasingly urban audiences.

Instead, I believe the Commission should consider two related dimensions, both basic to one of society's most important enterprises. The food we eat results from an immensely complex system hardly visible to us, as consumers. An understanding of that enterprise is important for all.

1. Local programming for producers. Producers of food need decision-guiding information, much of it local and timely – the kind broadcast stations can deliver so well. Among a station's listeners, farmers and ranchers are perhaps most reliant on local information. It helps them deal with changing local weather, soil conditions, input sources, markets, events, emergencies, policy matters and other factors basic to their livelihood.

Local broadcast information services for producers have eroded badly. Large metropolitan-based radio stations were first to reduce their agricultural programming. Less policy emphasis on need for public service programming contributed to this trend, as did the narrow focus mentioned earlier. Independent farm programming networks stepped in to help fill that gap, but they cannot provide the local coverage of an individual station. More recently, local programming on smaller stations is being reduced by revised media ownership policies that permit concentration of programming and militate against local coverage.

Research suggests that alternative information sources, such as new electronic technologies, are limited in meeting the local information needs of producers. First, the so-called "digital divide" is posing serious concerns. One concern involves limited access to broadband information technologies in rural areas. Another issue of inequitable access arises from the fact that online agricultural information services often involve user-pay, so are available more readily to larger than to smaller producers. Agricultural broadcasts can reach and serve all. Furthermore, web-based agricultural information sources often represent special-interest perspectives and provide limited localized information. Some of the most effective local potentials for web-based information

services to producers may emerge from teaming them with agricultural broadcast services of radio stations.

Low-power FM stations will lack resources to staff for expertise in providing the agricultural information services that producers need. The agricultural broadcasting record of public radio stations in the U.S. seems clear. They generally lack finances to staff for agricultural/food coverage. Low-power FM stations will be even less able, financially, to do so.

2. Local information needs of consumers. Increasingly, consumers need – and are insisting on – information about the supply, sources, quality, safety, healthfulness and nutritional value of the food they eat. Their expanding use of organic foods, farmers' markets and other local food sources helps us recognize their growing need and desire for local information about food and agriculture. Food safety issues that make headlines nationally and international usually have important local dimensions and implications. The timeliness, versatility and humanizing capabilities of agricultural radio and television programming on individual stations can serve those needs effectively.

These are among the reasons that prompt me to urge the Commission to place special emphasis on seeking ways to stimulate and strengthen localized agricultural programming. Large regional and metropolitan-based stations need incentives to provide more coverage of agricultural/food/rural matters appropriate for consumers, in particular. Such incentives might involve increasing standards for public service programming (including food/agriculture) as part of the station licensing renewal process. Incentives for increased local programming of smaller broadcast stations may require revisiting the media ownership policies that now appear to be stifling it. Also, I endorse efforts to examine closely the aspects of voice-tracking technologies that damage and compromise localized broadcast programming.

Thank you for this opportunity to express my thoughts and suggestions. Best wishes in considering broadcast localism, an issue extremely important to the public interest.

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